



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
CHATTANOOGA ENVIRONMENTAL FIELD OFFICE

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RC  
file: Cleveland  
S/W-2014  
(Bradley)

October 15, 2014

CERTIFIED MAIL  
7011 3500 0002 9516 9179

Honorable Tom Rowland  
City of Cleveland  
PO Box 1519  
190 Church St. NE  
Cleveland, TN 37377

Re: Compliance Evaluation Inspection (CEI)  
City of Cleveland Municipal Separate Storm Sewer System (MS4) – Phase II  
NPDES Permit Number TNS075213  
Bradley County, TN

Dear Mayor Rowland:

On September 30, 2014, Mr. Michael Bascom of the Division of Water Resources performed a Compliance Evaluation Inspection of the City of Cleveland's MS4 program. He met with Mr. Chris Broom, who provided information during the inspection. The purpose of the inspection was to evaluate the City of Cleveland's compliance with the terms and conditions of NPDES Permit Number TNS075213.

**Permit**

The City of Cleveland's MS4 Phase II NPDES permit, TNS075213 became effective on April 19, 2011 and it will expire on September 1, 2015. The permit requires the development of a storm water management program to improve water quality of receiving streams by controlling the quality and quantity of storm water runoff.

## **Stormwater Management Program**

The MS4 had a written Stormwater Management Plan (SWMP) which contained information on each of the six minimum control measures including Public Education and Outreach.

The MS4's GIS database contains a map of "hotspots" which they can use to locate possible sources of pollutants found in streams within its MS4 boundary. The proposed ordinance lists the following facilities as "hotspots": vehicle salvage yards and recycling; vehicle service and maintenance; vehicle and equipment; fleet storage areas; industrial sites; marinas; public works; hazardous waste generators; commercial container nursery and restaurants. Their long term strategy will be to enact preventative measures to limit illicit discharges of pollutants to streams within its MS4 boundary.

In a CEI of a MS4, only one of the minimum control measures is evaluated. During this inspection, Mr. Bascom reviewed the MS4's Public Education and Outreach minimum control measure.

### **Minimum Control Measure: Public Education and Outreach**

According to the documentation provided, the City of Cleveland (hereafter referred to as "the MS4") has implemented a Public Education and Outreach program. As required by the permit, the MS4 had developed a Public Information and Education Plan (PIE). A method to evaluate the PIE's effectiveness had been incorporated into the PIE which included goals and target dates.

The PIE included the following targeted educational campaigns:

- General Public awareness on the impacts of water quality from general housekeeping activities
  - MS4 personnel distributed brochures to homeowners at local events: Chalk the Walk 2013, spring stream clean-up 2013
  - The MS4 participates in the TAB Public Service Announcement program which broadcasts public service announcements on the impacts to water quality from general housekeeping activities
- Homeowner associations and other operators of permanent BMPs awareness of the importance of maintenance activities
  - On October 2013, the MS4 distributed 72 brochures on Pet Waste and Water quality to residents of Benjamin Crest subdivision
  - The MS4 gives Public Notices to insure that the public can participate in meetings on stormwater related issues
- Local Engineering and development community awareness of ordinances, regulations and guidance materials
  - MS4 personnel discuss ordinance and regulations one on one with developers at plans review meetings

- General Public and commercial applicators awareness use and disposal of pesticides
  - April 2013: MS4 personnel distributed 205 brochures on commercial landscapers & lawn care. January 2014: MS4 personnel distributed 200 brochures at 4 different events held at local outdoor supply stores
- General Public and commercial applicators awareness proper use and disposal of oil
  - MS4 partners with Keep America Beautiful in a Hazardous Household Waste Collect Day
- General public and municipal employee awareness of identifying illicit discharges
  - MS4 personnel hold training class for public works, parks and recreation and golf course employees
- Local engineering, development, and construction community awareness of stormwater ordinances, regulations and guidance materials related to construction phase water quality impacts
  - MS4 personnel promote the Tennessee EPSC Level 1 and Recertification courses
  - MS4 personnel discuss ordinance and regulations one on one with developers at plans review meetings
- Municipal employee awareness of water quality impacts from daily operations
  - MS4 personnel hold training class for public works, parks and recreation and golf course employees
  - In reviewing the PIE, personnel stated that the following education and outreach events had been held: Chalk the Walk, Spring stream clean-up, (3) Project WET classes

As required by the permit, MS4 personnel track and maintain records of these activities.

**Violations:**

None.

**Additional Comments:**

During the inspection, Mr. Broom stated that the City of Cleveland has not yet passed an ordinance which includes the new stormwater requirements from your permit. According to your permit, a revised ordinance or other regulatory mechanism for permanent stormwater management including green infrastructure BMPs must be passed within 48 months of the permit's effective date, April 19, 2015.

This letter provides a record of the September 30, 2014 Compliance Evaluation Inspection.

We thank the City of Cleveland for its efforts toward compliance with its NPDES permit. Furthermore, you have taken a proactive approach for protecting the stream and waterways of Tennessee. If you have any questions concerning either our inspection or this report, please contact Mr. Bascom at (423) 634-5710.

Sincerely,



Jennifer Innes

Environmental Program Manager  
Division of Water Resources

cc: Janice Casteel, City of Cleveland  
Chris Broom, City of Cleveland MS4

# City of Cleveland PIE 2014

Public Information and Education Implementation Metrics				
Activity	Supporting Documentation	Metric	Permit Year	Results
Brochure Distribution	Copies of brochures, list of placements and number of each type placed in each location.	Number of distributed brochures	2 3 4 5	65- "A Guide for Homeowners" 1.1.28- "A Guide for Homeowners" (See Brochure Distribution Sheet)
Website	Web hit counter that can be reset or account for annual hits from a running total.	Number of hits	2 3 4 5	72 People / 237 Views (January 2013 to April 2013) 36,201 Hits (April 2013 to March 2014)
Public Service Announcements	Receipt of payment, summary of statistics showing which stations and number of times per day/month/year.	Approx. Number of Listeners and Broadcasts	2 3 4 5	Looking at restarting TAB for 2013 and TV Ads TAB has restarted see files for reporting
Public School Outreach	Note information on number of students from correspondence with teachers.	Est. Number of Students/Teachers	2 3 4 5	4 Classes/ 24 Students per class, 2 Project Wet Classes 3 Project Wet classes (76 teachers).
Public Notices	Web hit counter, newspaper circulation information, number of posted notices and list of locations where they are placed.	Number of Notices/Number of People in Attendance at Hearings and/or Comments Received	2 3 4 5	1- 11/15/2012 1- 8/29/2013
Hazardous Waste Collection Event Advertisement	Web hit counter and /or Number of pamphlets distributed	Number of Web Hits and / or Pamphlets Distributed	2 3 4 5	2 Events Spring and Fall 2 Events Spring and Fall
Outreach to Professional Chemical Applicators	Number of pamphlets distributed	Number of Web Hits and / or Pamphlets Distributed	2 3 4 5	15 Mailed (delayed due to printer) 405 (See Brochure Distribution Sheet)
Exhibitions/ Speaking Engagements	List of engagements (date and location) and topics discussed will be kept on file	Number of participants for each event	2 3 4 5	1 event- 9 people (stormwater program) 4/23/2012 1 event- 17 people CAI Environmental Comm. (stormwater utility) 3/20/2014
Contractor Education	List of engagements (date and location) and topics discussed will be kept on file	Number of participants attending workshops	2 3 4 5	Newsletter (On the Level) 2/22/2013 Promoted TDEC Level 1 and Recertification Classes
Pre-Construction Meetings	Copies of signed pre-construction forms kept on file	Number of pre-construction conferences held for reporting period	2 3 4 5	61 Permits issued/ each permit must have a Pre-Con. 46 Permits issued/ each permit must have a Pre-Con.
Municipal Employee Training	Sign-in sheets with name, date and topic covered	Number of staff trained	2 3 4 5	29 PW Employees - 3/16/2012 (early) 8 Parks and Rec and 6 Golf Course Employees



2 Project world classes sets, No. 1

City of Cleveland

[illegible]

- attendees given brochure

\*Supporting document for PIE showing events and locations where brochures were distributed or left for public *MQS-9/30/14*

